

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Westside Lead - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initial PolRep  
Westside Lead  
C482  
ATLANTA, GA  
Latitude: 33.7654320 Longitude: -84.4087470

**To:** James Webster, USEPA R4 ERRPB

**From:** Chuck Berry, OSC

**Date:** 1/28/2020

**Reporting Period:** 01/06/2020 - 02/01/2020

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C482	<b>Contract Number:</b>	
<b>D.O. Number:</b>	68HE0420F0006	<b>Action Memo Date:</b>	11/4/2019
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/6/2020	<b>Start Date:</b>	1/6/2020
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	GAN000407160	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	GA EPD
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Other - Historical use of contaminated fill prior to implementation of the Resource Conservation and Recovery Act (RCRA).

#### 1.1.2 Site Description

##### 1.1.2.1 Location

The Westside Lead Site is located in the English Avenue neighborhood of Atlanta, just west of downtown. The site is bounded by Joseph E. Boone Boulevard to the south, James P. Brawley to the west, Cameron Alexander Boulevard to the North, and the former CSX rail line to the east. The address used is 395 Elm Street, Atlanta, Fulton County, Georgia 30314. The site coordinates are Latitude: 33.7654320, Longitude: -84.4087470.

The site is primarily residential with commercial property interspersed throughout, but particularly along the eastern border abutting the former rail line. Based on current property usage, there are 368 residential properties within the boundary. Most are single-family homes, although there are several multi-family properties within the area. Nearly all of the owners are absentee landlords renting out the property. Additionally many parcels in English Avenue are unimproved or abandoned. The 2008 housing crisis left many properties distressed, and many properties remain abandoned. Based on a review of the tax parcels database, only about 10% of the neighborhood is owner-occupied. A lot-by-lot physical inspection of the residential property in the neighborhood shows about 40% of the properties are unimproved lots without a house at all. About 15% of all the properties are abandoned empty houses, and the remaining 45% are occupied.

##### 1.1.2.2 Description of Threat

The English Avenue neighborhood was developed in the late 1880s through the first half of the 20th Century. During that time, several foundries operated in the Atlanta area, and the slag generated as a byproduct was reportedly available for use as fill. Based on subsequent investigation, slag appears to underlie not only large areas spanning multiple properties, but also in smaller, discrete locations where the owner or contractor needed to fill in low areas or reinforce driveways and alleyways with a readily-available source of road bed.

The slag used in English Avenue has high concentrations of lead. Portions of the slag pulverized and analyzed by Emory University, showed lead concentrations in the slag over 6,100 milligrams per kilogram (mg/kg), or parts per million (ppm). The slag is intermixed with a range of smaller-sized particles, forming a soil layer that is, in places, at least 10 feet thick. This soil layer has lead concentrations greater than 400 ppm in the particle size range smaller than 150 microns. Lead is a hazardous substance as defined at title 40 of the Code of Federal Regulations, Section 302.4 (40 CFR 302.4). EPA has promulgated a Removal Management Level (RML) of 400 ppm lead for residential exposure scenarios. There are lead concentrations in residential soil at the Westside Lead site that exceed the EPA RML that are a threat to human health for persons living on or near these properties.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In 2018, a Doctoral candidate working in the Saikawa Lab at Emory University was studying lead and other heavy metal concentrations in urban gardens in Atlanta. Working with the Historic Westside Gardens club, Emory identified high lead levels in soil from lots surrounding the garden on Elm Street in English Avenue, with lead concentrations as high as 4,500 ppm. Subsequent investigation led to an unusual rock being shown to the student's adviser, who was also a Risk Assessor for the EPA Region 4 Superfund and Emergency Management Division's Superfund Scientific Support Branch. The EPA employee immediately identified the rock as slag. Since Emory used a sampling and analysis method similar to EPA's methods, the data were assessed to have reasonable quality. The Risk Assessor brought the information to the Region 4 Emergency Response, Removal, Prevention, and Preparedness Branch (ERRPPB) for review.

The data was subsequently turned over to the Georgia Department of Environmental Protection for assessment. In November 2018 GA EPD requested EPA initiate a Removal Site Evaluation, and On-Scene Coordinator (OSC) Chuck Berry was assigned the project. A meeting with the OSC, GA EPD, the City of Atlanta, and the Superfund Technical Assessment and Response Team (START) was held in December 2018 to discuss a sampling approach. EPA agreed to conduct the sampling and then return to the other entities with the results to discuss any future site plans.

Due to the Federal Government shutdown in December 2018 and January 2019, sampling activities did not commence until late March 2019. An initial study area of 60 parcels was selected from the 2-block area surrounding the Elm Street garden. The Superfund Technical Assessment and Response Team (START) contractor, Oneida Total Integrated Services (OTIE) sampled the lots using the Incremental Sampling Method (ISM). ISM attempts to obtain high-quality statistical data that more accurately reflects the average concentration across any area. Each improved property with a house was divided up into smaller exposure units (e.g. front/back/side). Additionally, any areas of increased exposure (e.g. play areas, gardens) were sampled independently. Unimproved lots were sampled as a single unit. The soil was sieved to obtain the fraction of particle sizes less than 150 microns ( $\mu\text{m}$ ) in diameter, as this is believed to more accurately reflect the average particle size one is exposed to after working or playing in the soil (based on the supposition that most adults and children brush the coarse material from their hands once done). An X-Ray Fluorescope (XRF) was used to analyze the sieved soil, and this was then split to obtain analytical laboratory results from the Region 4 Regional Laboratory in Athens, Georgia. Based on a statistical review of the data, initial samples achieved a 99.7% correlation with XRF data for sieved samples. This has allowed XRF to be the primary analytical method used at the site instead of relying on laboratory data turnaround.

Access to only 23 of the initial properties was obtained. However, 15 of those properties showed lead concentrations in at least one area of the property exceeded the Region 4 RML of 400 ppm. The OSC then expanded the site investigation area to encompass a total of 368 residential properties. Sampling continues as additional access agreements are received. The status of the sampling is given in Section 2.1.4 Progress Metrics. Generic resident information (number of residents and approximate ages) were collected where possible in order to facilitate prioritizing removals.

In November, 2020, an Action Memorandum was signed by the Region 4 Superfund and Emergency Management Division Director. The AM approved up to 2 feet of contaminated soil be removed from properties with lead concentrations greater than 400 ppm. Because of the impending holiday schedules, the OSC opted to wait until after the first of the year to mobilize to the site and begin construction of staging areas.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Response Actions This Reporting Period

EPA Region 4's Emergency and Rapid Response Services (ERRS) Contractor, CMC, Inc, mobilized to the site on January 6 to meet with the OSC and develop a site removal strategy. Once the meeting was held, CMC immediately began mobilizing equipment to the site to construct temporary staging areas on two empty lots in the neighborhood.

The Superfund Technical Assessment and START Team collected background dust samples and data to use for comparison to dusts generated during removal activities. Background dust levels (PM<sub>10</sub>) were measured at 0.013 milligrams per cubic meter of air ( $\text{mg}/\text{m}^3$ ). PM<sub>10</sub> was chosen since lead is also an ingestion hazard, and dust particles filtered out by the body are frequently introduced into the digestive tract. High-volume lead samples were also collected and found to be 0.000043 mg of lead per cubic meter of air. After analyzing the data, it was determined that lead levels in dust generated from site soils will not pose a threat to the general public prior to the Occupational Safety and Health Administration level for general dust is reached at 5.0  $\text{mg}/\text{m}^3$ . Therefore, the OSC determined that dust suppression activities will begin whenever site dust levels reach 3 times the ambient background level of 0.013  $\text{mg}/\text{m}^3$ , triggering action at 0.05  $\text{mg}/\text{m}^3$  of total PM<sub>10</sub> dust.

ERRS constructed a backfill staging area at an empty lot at the corner of Griffin Street NW and Jett Street NW. The lot was cleared of debris, gravel was placed down, and jersey barriers brought in to support soil stockpiles. Another staging area for contaminated soil was constructed AT 395 Elm Street. Trees and debris were removed and gravel and swamp mats were brought in to stabilize the soil.

The OSC used resident demographic data collected during the RSE to prioritize parcels for removal. Parcels were placed into a tiered system depending on the lead levels on the property and the ages of the residents living there. This approach is consistent with other Removal sites in Region 4. However, due to the large number of unimproved / abandoned lots in English Avenue, another tier was added to the standard 4-tier system to accommodate the lower risk posed by these lots. The tiers are:

Tier 1: Parcels with children under 14 living on them with lead levels greater than or equal to 1,200 ppm.

Tier 2: Parcels with children under 14 living on them with lead levels less than 1,200 ppm but greater than or equal to 400 ppm.

Tier 3: Parcels with adults age 14 and over living on them with lead levels greater than or equal to 1,200 ppm.

Tier 4: Parcels with adults age 14 and over living on them with lead levels less than 1,200 ppm but greater than or equal to 400 ppm.

Tier 5: Unimproved or abandoned property.

Use of the tiers is not mandated by any Agency-wide or Regional policy and only serves as a generalized measure of the risk posed by each parcel. Other extenuating factors may alter the sequencing of removals. Additionally, the database used to generate these tiers is not complete. Many properties were sampled without being able to interview the residents (most frequently when a landlord signs for access and the tenant is not home with the sampling occurs). There are currently no Tier 1 properties. Based on this process, 2 contiguous properties along Elm Street were targeted for the first removal actions as Tier 2 parcels. However, in order to work through the removal process, the OSC requested ERRS begin excavation on the neighboring empty lots, so that if delays moving soil and equipment through the neighborhood were encountered, it would cause no hardship on the owner.

During the week of January 20, ERRS began site preparation on the contaminated lots along Elm Street. Trees were removed and stumps were ground out where possible. After starting the process, a sewer manhole was discovered buried in the back of the lot at 402 Elm Street. The City of Atlanta Department of Watershed Management was notified, and they sent out engineers to assess the situation. DWM provided ERRS with the exact elevation the drain should be set at once repaired. After considering the technical challenge with excavating multiple lots at different times, it was decided to excavate all the contiguous lots with lead levels over 400 that drain into this manhole at once, allowing ERRS to complete a comprehensive drainage plan for the entire area. Historically, the manhole did not drain well, as it was clogged with debris and soil. It is hoped that the new grading will improve site drainage once completed.

START, ERRS, and the OSC performed a pre-removal inspection at the 3 occupied properties within the drainage basin of the manhole.

#### 2.1.2 Outreach and Community Involvement

EPA Region 4 continued the public outreach effort started under the site evaluation process. With the impending start of the removal action, a public meeting was held on January 23. The OSCs and Community Involvement Coordinator (CIC) were on hand to present the proposed removal action to the community and inform residents of potential neighborhood impacts.

The CIC continues to develop fact sheets for bi-monthly distribution.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

To date, no PRPs have been identified.

#### 2.1.4 Progress Metrics

Metrics are current as of the end of the reporting period.

SAMPLING	
Total Properties:	368
Access Granted:	130
Properties Sampled:	128
Properties Requiring Removal:	68
REMOVALS	
Properties Requiring Removal:	68
Properties in Progress:	6
Properties Completed:	0
Properties Remaining:	68
DISPOSAL	
Tons of non-hazardous soil:	0
Tons of soil treated:	0
Tons of hazardous waste (D008):	0

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Properties with a soil lead level in at least one decision unit will be scheduled. Priority will be given to properties with young children living at or who are frequent visitors the residence. Soil excavation will be from 0-1 feet generally. Residents will be urged to allow removal of trees from the property. Restoration will be made to as-near the original condition as possible. Sampling will continue as access agreements are received.

#### 2.2.1.2 Next Steps

The OSC has inquired about issuing a bi-monthly or quarterly newsletter to the residents in the site to inform them of impending traffic issues or other site information.

Disposal profile approval is still pending. The selected landfill has requested additional analytical on the excavated soil prior to acceptance. The excavated soil will be sampled the week of February 3.

#### 2.2.2 Issues

#### 2.3 Logistics Section

No information available at this time.

#### 2.4 Finance Section

##### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$450,000.00	\$256,000.00	\$194,000.00	43.11%
TAT/START	\$60,000.00	\$5,000.00	\$55,000.00	91.67%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$510,000.00</b>	<b>\$261,000.00</b>	<b>\$249,000.00</b>	<b>48.82%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

#### 2.5 Other Command Staff

No information available at this time.

#### 3. Participating Entities

No information available at this time.

#### 4. Personnel On Site

##### STAFFING THIS REPORTING PERIOD

OSCs: 1  
CICs: 1  
START: 2  
ERRS: 10

#### 5. Definition of Terms

No information available at this time.

#### 6. Additional sources of information

No information available at this time.

#### 7. Situational Reference Materials

No information available at this time.